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April 28, 2004

VIA FACSIMILE & REGULAR MAIL

William R. Ellis, Esq.  
Wood & Lamping LLP  
600 Vine Street, Suite 2500  
Cincinnati, OH 45202

Re: *Jefferson-Pilot v. Kearney*

Dear Bill:

For 8 months Mr. Kearney has been waiting the promised privileged log. Below are documents we know to have been withheld. I suspect that many of these missing documents relate directly to the issue on which we are set to have a hearing in May. I, therefore, demand their immediate production.

2590	2779	2883	2998 – 3004
2594	2781 – 2784	2889	3006 – 3008
2599 - 2681	2786	2907	3014 – 3016
2683	2792	2909	3068
2688	2810	2911	3070 – 3075
2698	2814	2914	3091
2726	2815	2927	3095 – 3101
2728	2819	2929	3105 – 3109
2730	2820	2931	3111 – 3112
2731	2825	2932	3122
2732	2827	2934	3132
2734 – 2740	2832	2935	3135
2742	2834	2938	3151
2745 – 2752	2841	2939	3152
2759	2847	2941 – 2944	3208
2762	2849	2949	3247
2772	2850	2963	3318
2774	2853	2978	3331
2777	2882	2984	3333 – 3336

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3350	3430 – 3450	3608 – 3610	3674
3356 – 3358	3468	3616	3677 – 3678
3366 – 3368	3474	3619	3680
3372	3480	3623	3686
3374	3493	3625	3691
3376	3497	3639	3695
3377	3503	3643 – 3646	3697
3382	3508	3648	3705
3385 – 3388	3509	3649	3707 – 3717
3390	3519	3651	3719 – 3724
3392 – 3397	3528	3655	3726 – 3773
3399 – 3413	3544	3666	3776 – 3780
3419	3547	3668	3783
3421 – 3423	3551	3669	3785
3428	3579	3671	

Sincerely,

GRAYDON HEAD & RITCHEY LLP

Michael A. Roberts

MAR/trg